

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendant.

Case No. 3:20-CV-01747 (PAD)

BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS, COSTS  
AND EXPENSES

**ALAN BRAM GOLDMAN'S MOTION FOR EXTENSION OF TIME  
TO ANSWER THE COMPLAINT OR OTHERWISE PLEAD**

**TO THE HONORABLE COURT:**

COMES NOW defendant Alan Bram Goldman specially appearing and **without voluntarily submitting to the jurisdiction of this Court**, through the undersigned attorney, and very respectfully states and prays:

1. On February 5, 2021, The San Juan Daily Star published the summons issued by this Honorable Court, pursuant to its Order for Summons by Publication, granting the Defendant thirty (30) days to answer the complaint. See, Docket No. 6-8. Pursuant to the above, Alan Bram Goldman's term to answer the complaint or otherwise plead expires on March 8, 2021.

2. Alan Bram Goldman has retained the services of the undersigned attorney. However, the undersigned attorney is still awaiting documents sent by the Defendant from the United States to Puerto Rico. As such, Counsel has not been able to diligently investigate the claims raised in the complaint, much less prepare a responsive pleading.

3. For these reasons, Alan Bram Goldman will require additional time in order to file his answer to the complaint or other responsive pleading. Accordingly, Alan Bram Goldman requests that the Court allow him an extension of time of 30 days, until April 7, 2021, in order to

file its answer or other responsive pleading. This extension is being sought in good faith and will not unnecessarily delay the proceedings.

4. By requesting this extension the Defendant does not waive and reserves all rights as to any available defenses it may assert against the complaint.

WHEREFORE, for the foregoing reasons, the Defendant requests that the Court allow him an extension of time until April 7, 2021, to file his answer to the complaint or other responsive pleading.

Respectfully Submitted

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of March 2021.

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*Attorney for Alan Bram Goldman*

IT IS HEREBY CERTIFIED that on this date we filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice electronically to all counsel at their address of record.

Date: March 3, 2021

By: s/Antonio A. Arias  
Attorney